## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11	
	§		
MMA LAW FIRM, PLLC,	§		
	§	Case No. 24-31596	
Debtor.	§		

# EQUAL ACCESS JUSTICE FUND, LP AND EAJF ESQ FUND, LP'S NOTICE REGARDING PROPOSED ORDERS FOR DEBTOR'S CONTINUED USE OF CASH COLLATERAL

# TO THE HONORABLE EDUARDO V. RODRIGUEZ, CHIEF UNITED STATES BANKRUPTCY JUDGE:

Secured Prepetition Lenders Equal Access Justice Fund, LP and EAJF ESQ Fund, LP (collectively, "<u>EAJF</u>"), by and through their attorneys, submit the following to assist with the Court's review and determination regarding the proposed orders submitted by EAJF and the Debtor in connection with the hearing on the Debtor's continued use of cash collateral:

- 1. ECF No. 341 contains the audio from a portion of the October 9, 2024 hearing on the Debtor's continued use of cash collateral. The hearing audio file is approximately 35 minutes long.
- 2. On October 11, 2024, EAJF and the Debtor each submitted proposed orders when an impasse was reached as to whether the Court had ordered that EAJF would be provided access to the Debtor's bank statements. ECF Nos. 349 [EAJF's proposed order] and 350-1 [Debtor's redline of proposed order].
- 3. EAJF submits that the discussion and the Court's ruling regarding EAJF's access to bank statements may be found at 19:48–21:24 of the hearing audio file. *See* ECF No. 341.

Dated: October 14, 2024

Respectfully submitted,

#### SPENCER FANE LLP

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### **CERTIFICATE OF SERVICE**

I certify that on October 14, 2024, a true and correct copy of the foregoing Notice was served by electronic service via the Court's ECF filing system on those parties registered to receive service and by electronic mail as indicated below:

Counsel for United States Trustee – via E-mail
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# Proposed Counsel for the Official Committee of Unsecured Creditors via E-mail

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> /s/ Misty A. Segura MISTY A. SEGURA